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NASA Policy Directive

COMPLIANCE IS MANDATORY

NPD 1210.2

Effective Date: January 13,
2005

Expiration Date: January 13,
2015

[Printable Format \(PDF\)](#)

Request Notification of Change

(NASA Only)

Subject: NASA Surveys, Audits, and Reviews Policy (Revalidated w/no changes 1/14/2010)

Responsible Office: Office of Internal Controls and Management Systems

1. Policy

NASA's policy is to establish minimum criteria for the conduct of Headquarters-initiated surveys, audits, and reviews (SARs) of NASA activities in such a way that the SARs are value-added and effective in support of the Agency's mission.

2. Applicability

- a. This NPD applies to any SAR program conducted or sponsored by NASA Headquarters for any NASA activity, whether administrative, functional, technical, or programmatic.
- b. This NPD applies to NASA Headquarters, Centers, and Component Facilities. This NPD applies to the Jet Propulsion Laboratory to the extent specified in its contract.
- c. This NPD does not apply to the Office of the Inspector General SARs.

3. Authority

42 U.S.C. 2473(c)(1), Section 203(c)(1) of the National Aeronautics and Space Act of 1958, as amended.

4. Applicable Documents

None.

5. Responsibility

- a. The SAR program sponsor shall ensure that all SARs include the following components:

(1) Objective and Scope: Each SAR program shall have a clear, documented objective and scope. The objective and scope shall relate to satisfying explicit external requirements or to helping the Agency identify or mitigate risks. The objective and scope shall be conveyed to each review team member and addressed at the SAR entrance conference.

(2) Team Composition: The size and experience of the SAR team shall reflect the scope and depth of the SAR. The SAR program sponsor shall maximize, to the extent feasible, the use of subject-matter experts drawn from multiple sources including Headquarters, Center(s), or contract technical experts as team members.

(3) Coordination: Center Director(s) and the cognizant Mission Directorate Associate Administrator shall be notified of SARs, providing sufficient time to adjust schedules or other factors as necessary. SAR activities shall be further coordinated with the relevant Center Director(s) or their designees.

(4) Criteria: SARs shall be conducted in accordance with written criteria, checklists, or protocols based on appropriate requirements documents (e.g. NPDs, NPRs, Federal regulations) provided to Center Directors, or their representatives, during precoordination. The criteria shall include review of previous findings, their corrective actions, and an evaluation of the continued effectiveness of those corrective actions.

(5) Communication: To maximize the added value of SARs, continuous communication shall take place throughout the conduct of SARs. The SAR team shall conduct entrance and exit conferences and frequent debriefs with the Center Director or designated representatives. The SAR team shall disclose any and all preliminary observations, findings, and recommendations at the time of the exit conference, except where sensitivity concerns dictate otherwise. Written materials and/or a draft report concerning the findings and recommendations shall be provided at the exit conference.

(6) Findings: All SAR findings shall be written, readable, and factual. In addition, the following factors shall be considered:

(a) Findings shall be objective and impact assessment accurately stated.

(b) The use of gratuitous findings (things the relevant program manager had already identified and was working on effectively) shall be minimized, but may be used in order to document and acknowledge work in progress.

(c) Repeat findings shall be highlighted for the benefit of Center Senior Management.

(d) The SAR team shall identify information which may be useful to the Center's root cause analysis efforts.

(e) The SAR team shall look for, and document, positive observations as well as findings.

(f) The SAR team shall highlight potential best practices for the benefit of Center Senior Management and for dissemination to other Centers.

(7) Findings and Recommendations: The SAR team shall clearly distinguish between findings (citing an explicit requirement and its rationale) and recommendations (providing the review team's rationale, such as knowledge of someone else's best practice; avoiding subjective personal opinion).

(8) SAR Critique: After each SAR, All SAR program sponsors shall ask the relevant

program manager and Center Senior Management to assess the value of the SAR. The response shall be provided to each SAR team member, the team leader, and the SAR program sponsor.

(9) SAR Follow through: All SAR programs shall have an established process and schedule to document closure of all findings.

Corrective/preventive actions to close the findings and notification of the results of the recommendations shall be provided by the Center to the SAR program sponsor. SAR program sponsors shall track through closure all actions in response to findings. On an annual basis, SAR program sponsors shall notify the Center Director or designated representative and the cognizant Mission Directorate of the status of SAR actions versus findings.

(10) SAR Program Analysis:

(a) SAR program sponsors shall periodically analyze and document the analysis of SAR programs conducted. The analysis shall address recurring or common problem areas disclosed by the SARs, solutions that worked, potential best practices identified, and results of Center SAR critiques. This analysis shall be provided to relevant Center organizations, the Associate Administrator of the SAR program sponsor's organization, and to the Assistant Administrator Infrastructure and Administration.

(b) SAR program sponsors shall adjust future SARs accordingly based on the analysis required above. This can include refinements to an effective SAR program including additional attention to previously discovered problem areas, consolidation with another SAR program, or discontinuation of the SAR program.

(11) The SAR program sponsor shall provide sufficient time prior to the SAR for Centers to perform self-assessments, using provided criteria and results of SAR program analyses. These Center self-assessments are for the use of the Center and shall not be used by the SAR team as a point of departure for the SAR.

(12) Requests for waivers, deviations, and equivalency associated with this policy shall be submitted in writing to the Assistant Administrator for Infrastructure and Administration for review and approval.

6. Delegation of Authority

None.

7. Measurements/Verification

In accordance with NPD 1280.1, SAR program sponsors shall develop, maintain, and communicate balanced measures for work for which they are responsible and accountable.

8. Cancellation

None.

REVALIDATED 1/14/2010, ORIGINAL SIGNED BY:

/s/ Sean O'Keefe
Administrator

Attachment A: (Text)

Definitions:

A.1 Surveys, Audits, and/or Reviews (SAR): An onsite assessment of a function, project, or program conducted at a NASA Installation by (or on the authority of) NASA Headquarters.

A.2 SAR Program: A planned series of SARs conducted at two or more NASA Installations by a SAR sponsor in order to support administrative, programmatic, technical, or functional requirements. Examples of SAR programs include procurement management surveys, functional reviews, or the Operations and Engineering Panel reviews. Single-event SAR, single- site SAR, Center internal SAR, mishap investigations, and routine program/project management reviews are examples of assessments not included in a SAR program.

A.3 SAR Program Sponsor: Organization at NASA Headquarters sponsoring or managing the SAR program.

A.4 Finding: A noncompliance or nonconformance with a statute, regulation, or NASA requirement.

A.5 Observation: Information regarding an event or condition during a SAR, recorded for explanatory purposes, and not requiring or recommending action.

A.6 Recommendation: Information regarding events or conditions that may be improved in effectiveness or efficiency, based on other Center practice(s), auditor experience, or other information. Recommendations require prudent consideration by Center management; however, corrective action is at the discretion of Center management.

A.7 Repeat Finding: A finding that is significantly similar to finding(s) from a previous SAR. Repeat findings may indicate systemic conditions or ineffective mitigation efforts with respect to the original finding.

(URL for Graphic)

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